

Marie-Ann Greenberg, MAG-1284
Marie-Ann Greenberg, Standing Trustee
30 TWO BRIDGES ROAD
SUITE 330
FAIRFIELD, NJ 07004-1550
973-227-2840
Chapter 13 Standing Trustee

IN RE:
TYRONE WILLIAMS
RONDA WILLIAMS

AURELIA MITCHELL DURANT
12616 N. 145TH WAY
SCOTTSDALE, AZ 85259

TYRONE WILLIAMS
RONDA WILLIAMS
228 MURIEL AVENUE
PLAINFIELD, NJ 07060

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

Case No.: 08-32161NLW

**NOTICE OF MOTION TO DISMISS
PETITION**

HEARING DATE: 1/27/2011

ORAL ARGUMENT REQUESTED

PLEASE TAKE NOTICE, that on 01/27/2011 at 10:00 am in the forenoon or as soon thereafter as counsel may be heard, the undersigned will move before Honorable Judge NOVALYN L. WINFIELD, at US Bankruptcy Court, 50 Walnut Street, Third Floor, D, Newark, NJ 07102, for an Order Dismissing this case.

The undersigned will rely on the attached Certification in support of this motion plus an oral report updating the information on the return date of this motion.

Marie-Ann Greenberg, Esquire
Chapter 13 Standing Trustee

By: /S/Marie-Ann Greenberg
Marie-Ann Greenberg, Esquire

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CERTIFICATION IN SUPPORT OF MOTION

I, Jackie Michaels, being of full age certify that:

1. I am an administrator for Marie-Ann Greenberg, Standing Trustee, and am familiar with the facts of this case.
2. The Debtor(s) case has been reviewed and it would appear that the plan can not complete within the 60 months limitation, due to the Debtor(s) being delinquent and/or higher proof of claims and/or unscheduled claims.
3. For the reasons set forth above, the Trustee recommends that the case be dismissed.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willingly false, that I am subject to punishment.

Dated: October 28, 2010

By: /S/ Jackie Michaels
Jackie Michaels
Administrator

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CERTIFICATE OF SERVICE

On October 28, 2010, the undersigned served to AURELIA MITCHELL DURANT, TYRONE WILLIAMS, and RONDA WILLIAMS a copy of the within Notice of Motion to Dismiss.

Notice of Motion was served via US Mail or electronically via ECF.

Dated: October 28, 2010

By: /S/ Jackie Michaels

Jackie Michaels
Administrator